



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 27, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Kimball Industrial Complex-Jasper 15 Street / 037-18242-00100

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03



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January 27, 2004

Mr. Matt Underwood
Kimball Industrial Complex-flexcel-Jasper 15th Street
1037 East 15th Street
Jasper, Indiana 47546

Dear Mr. Underwood:

Re: Exempt Construction Status
037-18242-00100

The application from Kimball Industrial Complex-flexcel-Jasper 15th Street, received on November 17, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following two (2) natural gas-fired air make-up units, and three (3) filter booths, to be located at 1037 East 15th Street, Jasper, Indiana, are classified as exempt from air pollution permit requirements:

- (a) Construction of two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.4 MMBtu per hour.
- (b) Replacement of three (3) conventional water pan booths with three (3) filter booths (identified as S18, SB5, and SB15).

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (b) This existing source submitted their Title V application (037-7356-00100) on December 4, 1996. The natural gas-fired air make-up units and three (3) conventional filter booths will be incorporated into the Title V prior to issuance.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/SD

cc: File - Jasper County
Jasper County Health Department
Air Compliance - Wanda Stanfield
Permit Tracking - Sara Cloe
Technical Support and Modeling - Michele Boner
Compliance Branch -
Title V Reviewer - Melissa Groch
Title V File - T037-7356-00100

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Kimball Industrial Complex-flexcel-Jasper 15 th Street
Source Location:	1037 East 15 th Street, Jasper, Indiana 47546
County:	Jasper
SIC Code:	2511, 3479, 2541, 2542
Operation Permit No.:	037-7356-00100
Operation Permit Issuance Date:	Not issued yet
Exemption No.:	037-18242-00100
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Kimball Industrial Complex-flexcel-Jasper 15th Street relating to the construction of two (2) natural gas-fired air make-up units, and the replacement of three (3) existing water pan booths with three (3) filter booths.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (a) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.4 MMBtu per hour.
- (b) Three (3) filter booths (identified as S18, SB5, and SB15) used in conjunction with three (3) spray booths.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 17, 2003, with additional information received on December 15, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 and 2).

Potential To Emit of New Emission Units Before Control

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.

Pollutant	Potential To Emit (tons/year)
PM	0.29
PM10	0.29
SO ₂	0.02
VOC	0.21
CO	3.24
NO _x	3.85

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	8.09E-05
Dichlorobenzene	4.63E-05
Formaldehyde	2.89E-03
Hexane	6.94E-02
Toluene	1.31E-04
TOTAL	7.52E-02

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the two (2) air make-up units, and three (3) filter booths are subject to the provisions of 326 IAC 2-1.1-3. An exemption shall be issued.

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone.

Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Jasper County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This existing source submitted their Part 70 (T037-7356-00100) application on December 4, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for all criteria pollutants:
 - (1) With the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants,
 - (2) That is subject to an emission limitation or standard for all criteria pollutants, and.
 - (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this modification.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is subject to the requirements of National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations (NESHAP) (40 CFR 63, Subpart JJ and 326 IAC 14) promulgated December 7, 1995. The requirements of this NESHAP will be incorporated in the pending TV.

State Rule Applicability - Entire Source

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

26 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of two (2) natural gas-fired air make-up units will emit less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Two (2) Natural Gas-Fired Air Make-up Units

There are no specifically applicable regulations that apply to these emission units.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification.

Conclusion

The construction of the two (2) air make-up units and three (3) filter booths shall be subject to the conditions of the attached proposed Exemption 037-18242-00100.

Appendix A: Emission Calculations
Two (2) Air Make-up Units Burning Natural Gas

Company Name: Kimball Industrial Complex - flexcel - Jasper - 15th Street

Address: 1037 East 15th Street, Jasper, Indiana 47546

Exemption: 037-18242

Plt ID: 037-00100

Reviewer: ERG/SD

Date: January 6, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

8.80

(2 Units Only)

77.1

Pollutant						
Emission Factor (lb/MMCF)	* PM 7.6	* PM10 7.6	SO ₂ 0.6	** NO _x 100	VOC 5.5	CO 84.0
Potential To Emit (tons/year)	0.29	0.29	0.02	3.85	0.21	3.24

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

** Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Two (2) Air Make-up Units Burning Natural Gas

Company Name: Kimball Industrial Complex - flexcel - Jasper - 15th Street

Address: 1037 East 15th Street, Jasper, Indiana 47546

Exemption: 037-18242

Plt ID: 037-00100

Reviewer: ERG/SD

Date: January 6, 2003

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	8.09E-05	4.63E-05	2.89E-03	6.94E-02	1.31E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.93E-05	4.24E-05	5.40E-05	1.46E-05	8.09E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).

Additional HAPs emission factors are available in AP-42, Chapter 1.4.